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CHEVRON U.S.A. INC.,
a Pennsylvania corporation

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

Case No. 2:23-cv-6302-HDV-AJR

**DEFENDANT CHEVRON U.S.A.,
INC.'S NOTICE OF MOTION AND
MOTION IN LIMINE NO. 1 TO
EXCLUDE EVIDENCE OR
TESTIMONY OF ANY SUBJECTIVE
OPINION OR BELIEF BY PLAINTIFF
REGARDING HIS PAST OR FUTURE
ECONOMIC DAMAGES**

Date: July 24, 2025

Time: 10:00 a.m.

Place: Courtroom 5B – Fifth Floor

District Judge: Hon. Hernán De. Vera

Magistrate Judge: Hon. A. Joel Richlin

Action Filed: August 3, 2023

Trial Date: August 19, 2025

TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on Tuesday, July 24, 2025 at 10:00 a.m., or as soon thereafter as counsel may be heard in the courtroom of the Honorable Hernán D. Vera, located in the First Street U.S. Courthouse, Courtroom 5B, 350 West 1st Street, Los Angeles, California 90012, Defendant Chevron U.S.A. Inc., a Pennsylvania corporation (“Chevron U.S.A.”) will move and hereby does move for an order barring Plaintiff Mark Snookal (“Plaintiff”) from introducing the subjective opinions and beliefs of Plaintiff and his witnesses regarding Plaintiff’s past and future economic damages pursuant to Federal Rules of Evidence 402, 403, 701 and 702.

This motion is made following the conference of counsel pursuant to C.D. Cal. Local Rule 7-3, which took place on June 17, 2025, and in writing on June 19, 2025.

This motion is based on this Notice, the accompanying Memorandum of Points and Authorities, the Declaration of Robert Mussig, all pleadings, papers and other documentary materials in the Court’s file for this action, those matters of which this Court may or must take judicial notice, and such other matters as this Court may consider in connection with the hearing on this matter.

Dated: July 8, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Tracey A. Kennedy
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CHEVRON U.S.A. INC.,
a Pennsylvania Corporation